

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware  
corporation; and AMAZON.COM SERVICES  
LLC, a Delaware limited liability company,

Plaintiffs,

v.

QIANG LIU, an individual; YALIN WU, an  
individual; LIAO DENGKUN, an individual;  
and DOES 1-10,

Defendants.

No. 2:23-cv-00484-JHC-SKV

**ORDER GRANTING PLAINTIFFS' *EX*  
*PARTE* MOTION FOR DEFAULT  
JUDGMENT, CANCELLATION OF  
TRADEMARK REGISTRATION, AND  
PERMANENT INJUNCTION AGAINST  
DEFENDANTS**

THIS MATTER comes before the Court on the *Ex Parte* Motion for Default Judgment, Cancellation of Trademark Registration, and Permanent Injunction (the "Motion") brought by Plaintiffs Amazon.com, Inc. and Amazon.com Services LLC (collectively, "Amazon" or "Plaintiffs") against Defendants Qiang Liu, Yalin Wu, and Liao Dengkun (collectively, "Defendants"). Dkt. # 45. The Court, having considered Plaintiffs' Motion, this matter's files and records, the governing law, and being fully advised, finds that Plaintiffs have established the liability of Defendants and their entitlement to damages and permanent injunction. The Court agrees with Plaintiffs that the Court has subject matter jurisdiction over the claims brought herein and that it has personal jurisdiction over Defendant. The Court also agrees with Plaintiffs'

ORDER GRANTING PLAINTIFFS'  
*EX PARTE* MOTION FOR DEFAULT JUDGMENT  
AND PERMANENT INJUNCTION - 1  
(2:23-cv-00484-JHC-SKV)

1 application of the *Eitel* factors, which favor entry of default judgment. Accordingly, the Court  
2 ORDERS:

3 1. Plaintiffs' Motion is GRANTED and JUDGMENT is entered against Defendants  
4 on Plaintiffs' Claims for Misrepresentation of Copyright Infringement (17 U.S.C. § 512(f)),  
5 Breach of Contract, Tortious Interference with Contractual Relationship, Fraud, Violation of the  
6 Washington Consumer Protection Act (RCW 19.86.010 *et seq.*), Cancellation of the Dhuog  
7 Trademark for Fraud and As Void Ab Initio for Lack of Use as of Filing Date (15 U.S.C. §§  
8 1064 and 1119), and Civil Liability for False or Fraudulent Registration (15 U.S.C. § 1120).

9 2. The Court hereby orders that U.S. Trademark Reg. No. 6,334,242 is cancelled in  
10 its entirety pursuant to 15 U.S.C. §§ 1064 and 1119.

11 3. The Court finds Plaintiffs' requested attorneys' fees incurrent in connection with  
12 this action to be reasonable.

13 4. Accordingly, the Court awards Plaintiffs monetary recovery in connection with  
14 this action in the amount of \$84,035.50 in attorneys' fees pursuant to 17 U.S.C. § 512(f) and  
15 RCW 19.86.090.

16 5. Defendants and their officers, agents, servants, employees, and attorneys, and all  
17 others in active concert or participation with them who receive actual notice of the order, are  
18 hereby permanently ENJOINED AND RESTRAINED from:

- 19 a. Submitting to Amazon any takedown notifications based on false assertions  
20 of rights of copyright ownership by any means or otherwise violating 17  
21 U.S.C. § 512(f), whether as written submissions, through the "Report  
22 Infringement" form, or using the "Report a Violation" tool;
- 23 b. enrolling or attempting to enroll in Amazon Brand Registry;
- 24 c. filing fraudulent trademark applications or registrations with the USPTO in  
25 order to gain access to Amazon's Brand Registry;
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- 1 d. Issuing fraudulent trademark takedown notices using Amazon's Brand  
2 Registry; and  
3 e. assisting, aiding, or abetting any other person or entity in engaging or  
4 performing any of the activities referred to in subparagraphs (a) through (d)  
5 above.

6 6. The Court hereby retains jurisdiction over this case for the purpose of enforcing  
7 this Order and Injunction, and for any supplemental proceedings that may be authorized by law.

8 7. Plaintiffs' counsel is hereby directed to serve a copy of this Order and Injunction  
9 on Defendants' last known email addresses registered with Amazon and the United States Patent  
10 and Trademark Office, which Plaintiffs used to complete service.

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12 SO ORDERED this 16th day of August, 2024.

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15 JOHN H. CHUN  
16 UNITED STATES DISTRICT JUDGE  
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